

**G O D D A R D   L A W   P L L C**

39 Broadway, Suite 1540 | New York, NY 10006

Office. 646.504.8363

Fax. 212.473.8705

anthony@goddardlawnyc.com

WWW.GODDARDLAWN.COM

October 21, 2020

Application granted. Deadline to file stipulation of discontinuance extended to 11/23/2020.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: New York, New York  
October 22, 2020

Re: **Hermenegildo v. A.C. Moore, 20 CV 5171 (PMH) (JCM)**

Dear Judge Halpern:

This firm represents the Plaintiff, Julio Hermenegildo. I am writing to request an extension of time until November 23, 2020 to file a stipulation of discontinuance. The case settled on September 23, and Magistrate Judge McCarthy ordered that a stipulation be filed by October 23; she also closed the referral to her (see Minute Entry dated October 23, 2020). This is the first request for an extension. I emailed counsel for Defendant A.C. Moore, Julie Gottshall, earlier this afternoon to seek consent to this request, but I have not yet received her response. The reason for my request is that, although the parties have executed a settlement agreement, the settlement payments have not yet been received. In view of Defendant A.C. Moore's professed insolvency, this is of particular concern in this action.

We appreciate the Court's consideration of this request.

Respectfully submitted,



Anthony P. Consiglio

cc: All Counsel (by ECF)